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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

GREATER HELLS CANYON COUNCIL,

Case No. 3:22-cv-00980-MO

Plaintiff,

v.

**JOINT STATUS REPORT AND
STIPULATED MOTION TO STAY
PROCEEDINGS**

UNITED STATES DEPARTMENT OF
AGRICULTURE, et al.,

Defendants.

1. On July 7, 2022, Plaintiff filed a complaint under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, challenging Defendants’ responses to three FOIA requests. *See generally* Compl., ECF 1.

2. In particular, Plaintiff challenges Defendants’ response to a 2015 FOIA request, Compl. ¶¶44-64, and to two 2021 requests, Compl. ¶¶ 65-91.

3. On August 10, 2022, Defendants answered and asserted affirmative defenses. ECF 8.

4. The Court has not yet entered a scheduling order.
5. The parties are in active discussions to resolve this matter without further litigation.
6. Defendants are reviewing their responses to Plaintiff's FOIA requests at issue in the complaint and anticipate making additional document productions every thirty days beginning October 7, 2022.
7. To allow time for Defendants to complete the disclosures as stated above and for the parties to resolve as many issues in this matter as possible between themselves, the parties stipulate and request that this matter be stayed until February 10, 2022. Defendants anticipate they will have substantially completed additional productions in this matter by that time.
8. The parties request that the Court direct the parties to file another Joint Status Report by February 10, 2023.

RESPECTFULLY SUBMITTED this 7th day of September, 2022.

s/ Erin Hogan-Freemole
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Plaintiff's Counsel

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AGREED ORDER

IT IS SO ORDERED this ____ day of September, 2022.

MICHAEL W. MOSMAN
United States District Judge